

JAFFE EXHIBIT 82

CONFIDENTIAL - ATTORNEYS EYES ONLY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-oOo-

WAYMO LLC,)
)
Plaintiff ,)
)
vs.) Case No: 3:17-cv-00939-WHA
)
UBER TECHNOLOGIES, INC.,)
OTTOMOTTO LLC, OTTO TRUCKING,)
LLC,)
)
Defendants.)
_____)

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VIDEOTAPED DEPOSITION OF DANIEL GRUVER
San Francisco, California
Thursday, April 20, 2017

Reported by:
LISA R. TOW
CSR No. 6629
Job No. 2599857

PAGES 1 - 73

Page 1

Page 26

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1 [REDACTED] [REDACTED]
2 [REDACTED] 09:37:22AM
3 Q. And that was around the same time 09:37:22AM
4 that it was publically announced? 09:37:26AM
5 A. Yeah, I think it was exactly the 09:37:28AM
6 same time. 09:37:31AM
7 Q. [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED]
15 [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED]
17 [REDACTED] 09:38:08AM
18 Q. The -- going back to [REDACTED]. Did 09:38:13AM
19 [REDACTED] 09:38:26AM
20 A. Yes. 09:38:30AM
21 Q. [REDACTED] [REDACTED]
22 [REDACTED] 09:38:34AM
23 A. A combination of engineers. 09:38:35AM
24 Q. Can you name any specific people 09:38:37AM
25 that you are aware of that were involved in 09:38:39AM

Page 31

Page 60

1	have happened, but I --	10:50:17AM
2	Q. What was Anthony Levandowski's	10:50:20AM
3	role in the decision to pivot from Spider to	10:50:23AM
4	Fuji?	10:50:27AM
5	A. He had the opportunity to veto a	10:50:28AM
6	design change. But didn't. So, I guess --	10:50:34AM
7	Q. But ultimately the decision as to	10:50:42AM
8	whether to pivot from Spider to Fuji would	10:50:44AM
9	have been up to Anthony Levandowski; fair?	10:50:49AM
10	A. Yes.	10:50:55AM
11	Q. Fair.	10:50:55AM
12	And was Spider designed to rotate about	10:50:58AM
13	in access?	10:51:05AM
14	A. Yes.	10:51:06AM
15	Q. Did the outgoing laser beams go	10:51:06AM
16	through a hole in a mirrored surface in	10:51:10AM
17	Spider?	10:51:13AM
18	A. Yes.	10:51:13AM
19	Q. Did the incoming reflected light	10:51:15AM
20	bounce off that mirrored surface on it's way	10:51:19AM
21	to the received block in Spider?	10:51:23AM
22	A. Yes.	10:51:24AM
23	Q. Would light transmit out and	10:51:29AM
24	return through the same lens pair in Spider?	10:51:32AM
25	A. So, we prototyped a handful of --	10:51:36AM

1	discussed a handful of designs. I'm trying	10:51:48AM
2	to remember which one was the last plan of	10:51:51AM
3	record. But, I believe the sort of last	10:51:53AM
4	plan of record had that.	10:51:56AM
5	Q. And did Spider use more than one	10:51:58AM
6	laser?	10:52:01AM
7	A. Clarify.	10:52:06AM
8	Q. Did Spider have available to it	10:52:07AM
9	the use of more than one laser?	10:52:12AM
10	A. Yes.	10:52:14AM
11	Q. And did the received block in	10:52:14AM
12	Spider use more than one receiver?	10:52:18AM
13	A. Yes.	10:52:21AM
14	Q. Did the light going out -- let me	10:52:22AM
15	start over again.	10:52:26AM
16	When the light went out in Spider would	10:52:28AM
17	it partially overlap with the path of light	10:52:34AM
18	returning to the received block?	10:52:39AM
19	A. Yes.	10:52:41AM
20	Q. And was -- were the lenses in	10:52:55AM
21	Spider were they in a housing of some kind?	10:53:09AM
22	A. Yes.	10:53:12AM
23	Q. Why don't we go off the record.	10:53:12AM
24	THE VIDEOGRAPHER: Off the record at	10:53:19AM
25	10:50 a.m.	10:53:24AM